

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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TZVI WEISS, et al., :
Plaintiffs, : Case No. 05-cv-4622 (DLI) (MDG)
- against - :
NATIONAL WESTMINSTER BANK PLC, :
Defendant. :
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NATAN APPLEBAUM, et al., :
Plaintiffs, :
- against - : Case No. 07-cv-916 (DLI) (MDG)
NATIONAL WESTMINSTER BANK PLC, : Oral Argument Requested
Defendant. :
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**REPLY DECLARATION OF STEPHANIE D. SADO IN SUPPORT OF THE MOTION
FOR SUMMARY JUDGMENT BY NATIONAL WESTMINSTER BANK PLC**

Stephanie D. Sado declares as follows:

1. I am an attorney admitted to practice before this Court and an associate at Cleary Gottlieb Steen & Hamilton LLP, counsel to Defendant National Westminster Bank Plc (“NatWest”). I submit this reply declaration in support of NatWest's motion for summary judgment. Submitted with this declaration are true and correct copies of the following documents, which are cited in National Westminster Bank Plc's Reply Brief in Support of NatWest's Motion for Summary Judgment.¹

¹ The abbreviated reference that appears in parentheses after each exhibit denotes how the exhibit is identified in NatWest's Reply Brief.

EXHIBIT 1: "Business as Usual for Defiant City," Evening Standard (London), Apr. 26, 1993; "1 Dead, 40 Hurt As a Blast Rips Central London," The New York Times, April 25, 1993; "City Hopes for 'Business as Usual' After IRA Bomb," The Independent (London), April 13, 1992.

EXHIBIT 2: Excerpts from the July 23, 2010 deposition of Amanda Holt ("Holt 7/23/10 Tr.").

EXHIBIT 3: Excerpts from the July 16, 2010 deposition of Stephen Foster ("Foster 7/16/10 Tr.").

EXHIBIT 4: Excerpts from the NatWest Annual Report and Accounts 2003.

EXHIBIT 5: Excerpts from the June 24, 2008 deposition of Belinda Lane ("Lane 6/24/08 Tr.").

EXHIBIT 6: Excerpts from the July 14, 2010 deposition of Michael Hoseason ("Hoseason 7/14/10 Tr.").

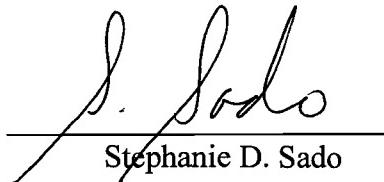
EXHIBIT 7: Excerpts from the July 15, 2010 deposition of Michael Hoseason ("Hoseason 7/15/10 Tr.").

EXHIBIT 8: Excerpts from the June 8, 2010 deposition of Guy Cole ("Cole 6/8/10 Tr.").

EXHIBIT 9: Excerpts from the July 22, 2010 deposition of Irvine Rodger ("Rodger 7/22/10 Tr.").

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
February 29, 2012



Stephanie D. Sado